

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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SMART VENT PRODUCTS, INC.,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO.:
	:	1:13-cv-05691-JHR-KMW
	:	
v.	:	
	:	
CRAWL SPACE DOOR	:	
SYSTEM INC., d/b/a CRAWL	:	
SPACE DOOR SYSTEMS, INC.	:	
	:	ELECTRONICALLY FILED
Defendant.	:	

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**DECLARATION OF TOM LITTLE**

I, Tom Little, CFM, CGP, being of full age, declare the following:

1. I am the Vice President of Smart Vent Products, Inc. (“Smart Vent”), the plaintiff in this action. I am over eighteen years of age and am competent to testify to the matters set forth in this declaration. The following statements set forth in this declaration are based upon my personal knowledge.

2. I submit this Declaration in support of Plaintiff’s Memorandum Of Law In Support of its Opposition to Defendant’s Motion for Sanctions under Rule 37(B) or the Court’s Inherent Authority (ECF 286) and in support of its Opposition to Defendant’s Motion to Conform the Pleadings to the Evidence Presented at Trial (ECF 285) and in Support of its Cross-Motion to Admit Evidence and for a Curative Jury Instruction.

3. I spoke with Brian Shaw on Monday, October 14, 2019. Based upon the information I provided to him, Mr. Shaw found a file on Smart Vent’s server labeled “AC 364 Revisions 2013”.

4. I reviewed that file and saw videos and photographs relating to the use of different flood vents in Smart Vent's test tank.

5. I provided all of the videos and photographs that show the Crawl Space Doors' flood vent to counsel, A.J. DiMarino P.C.

I certify under penalty of perjury that the foregoing statements made by me are true to the best of my knowledge, information, and/or belief.

Dated: October 18, 2019

A handwritten signature in black ink, appearing to read 'Tom Little', written over a horizontal line.

Tom Little, CFM, CGP  
Director of Sales and Marketing